

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION**

ORDER NO. R2-2006-0047

RESCISSION OF SITE CLEANUP REQUIREMENTS, ORDER NOS. 93-111 & R2-2003-0060

HEXCEL CORPORATION, DONALD AND SUZANNE SMITH, F&P PROPERTIES

for the property located at:

HEXCEL SITE
75 NORTH MINES ROAD (FORMERLY 10 TREVARNO ROAD) &
CONTRACTOR'S STREET
LIVERMORE, CALIFORNIA
ALAMEDA COUNTY

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter Water Board), finds that:

1. Water Board Orders: The Water Board adopted Site Cleanup Requirements, Order No. 93-111 for this site (the "Site") in September 1993. The Site, as described in Order 93-111, is defined to include both the "Hexcel Manufacturing Plant Operable Unit (HMP OU)" located at 75 North Mines Road and the "Abandoned Disposal Site Operable Unit (ADS OU)" located on Contractor's Street (see Figure 1). Cleanup requirements for the ADS OU were amended in June 2003 by Order R2-2003-0060, which describes final actions for the ADS OU. The requirements of Order 93-111, as amended, have been met.

2. Summary of Investigation and Remediation Activities:

a. ADS OU: Top Grade Construction (Top Grade), in early 2003, purchased the portion of the ADS OU where waste materials were buried. As part of the acquisition from Hexcel, Top Grade agreed to remove all waste materials and polluted soil, which exceeded approved commercial cleanup standards. It was the intent of Hexcel and Top Grade to complete this action in order to "clean close" (removal of all waste) the landfill and achieve no further action (NFA) status from the Board. By doing so, many of the requirements as set forth in Order No. 93-111 would be eliminated or minimized. The Board adopted SCR Order No. R2-2003-0060 to regulate this action.

The actions described in Order No. R2-2003-0060 have been successfully completed. All waste and impacted soil from Subsites 2A and 2B of the ADS OU, with the exception of the small inaccessible area which passes beneath Contractor's Way, between Subsites 2A and 2B, have been removed. With respect to the remaining portions of ADS OU (Subsites 2A and 2B), no further action other than the deed restriction prohibiting sensitive uses on the property is warranted. With respect to the area of waste beneath Contractor's Street, a risk management plan

and appropriate deed restriction have been developed and applied to assure appropriate long-term management of the waste, pursuant to Task 4 of Order No. R2-2003-0060.

b. HMP OU: The facilities at the HMP OU currently produce composite materials used in aerospace and other structural applications. The manufacturing involves impregnation of various fabrics with resins to produce a rigid structure. Hexcel will begin phasing out production at the plant over the next few years and intends to sell the property after operations cease.

Environmental investigations carried out through the 1980s and 1990s identified volatile organic compounds (VOCs) in soil and groundwater, and arsenic and barium in groundwater. Concentrations of acetone, benzene, methyl ethyl ketone (MEK), and tetrachloroethylene (PCE) were reported in groundwater as high as 6,200 milligrams per liter (mg/L), 120 mg/L, 12,900 mg/L, and 0.074 mg/L, respectively. In response, soil removal and groundwater extraction and treatment were conducted as interim remedial actions during the 1980s.

Order 93-111 required additional soil and groundwater sampling and remediation using in-situ air injection and extraction techniques. Order No. 93-111 also identified and set groundwater cleanup levels for the constituents of concern: acetone, benzene, MEK, PCE, arsenic, and barium.

Environmental investigations conducted from 1993 to 1999 showed that soil impacts were of limited extent and that concentrations of VOCs and metals were decreasing in groundwater. Extensive soil sampling and groundwater monitoring in 2003 and 2004 demonstrated that most concentrations are less than Regional Board Environmental Screening Levels (ESLs) for shallow soil with residential use. VOCs were less than ESLs in soil samples collected, however, about 515 cubic yards of soil were identified that had antimony concentrations that were elevated with respect to the ESL for residential, but not commercial land use.

In October 2004, the maximum groundwater concentrations of acetone, benzene, MEK, PCE and vinyl chloride were 0.103 mg/L, 0.00055 mg/L, less than 0.05 mg/L, 0.024 mg/L, and 0.0018 mg/L respectively. PCE and vinyl chloride were the only VOCs detected at concentrations greater than an ESL's of 0.005 mg/L and 0.0005 mg/L respectively. In October 2004, the maximum groundwater concentrations of arsenic and barium were 0.033 mg/L and 0.75 mg/L, respectively; less than their ESLs of 0.05mg/L and 1.0 mg/L. Natural processes should reduce the residual concentration of pollutants to drinking water standards before such time as the groundwater may be needed for water supply purposes. Consequently, it is appropriate to terminate groundwater monitoring activities and rescind Order Nos. 93-111 and R2-2003-0060. No further remedial action is needed at this site.

3. Basis for Rescission: The following are the basis for rescission of Order Nos. 93-111 and R2-2003-0060:

- The Site has been fully characterized.
- Soil and groundwater sampling at the HMP OU indicate that VOCs are less than ESLs in all wells except two, with PCE in well HEX-14S at 24 ug/L and vinyl chloride in well HEX-14M at 1.8 ug/L. It is reasonable to assume that natural

processes will continue to reduce the concentration of these pollutants in groundwater, restoring water quality before such time as the groundwater may be used for water supply purposes.

- Arsenic and barium in soil and groundwater at the HMP OU are usually less than ESLs for a potential drinking water source and no source of these metals could be identified. The magnitude and position of arsenic concentrations have been stable since the early 1990s and the migration of arsenic appears to be limited by natural attenuation. Both the arsenic and barium detected in groundwater may represent naturally occurring conditions.
- Due to the relatively low contaminant concentrations in soil and groundwater at the HMP OU, no significant impacts to human health or the environment are likely. Additionally, a deed restriction for the HMP OU has been recorded. The deed restriction prohibits the development of groundwater wells or use on the property, further insuring protection of human health.
- Any additional action at the HMP OU for soil containing antimony in excess of the ESL for shallow residential soil will be assessed pending determination of future land use. In addition, residual soil and/or groundwater pollution associated with the underground storage tank at Building 77 will be addressed when the building is removed. Both of these actions will be addressed outside of site cleanup requirements.
- Since adoption of Order No. 93-111, no significant groundwater impacts have been detected within the ADS OU. This being the case, the ADS OU no longer poses a significant threat to water quality and further groundwater monitoring is not necessary.
- All waste on the ADS OU, with the exception of the small area beneath Contractor's Street has been removed and deed restrictions with an associated risk management plan has been recorded on the property.

4. Future Land Use/Additional Actions: The HMP OU facility is slated for a phased closure in the next few years. The anticipated future use, based on current market conditions is residential. Moreover, market conditions may change and future use may change. During demolition and redevelopment of former industrial facilities impacts to soil and groundwater are often encountered. This site has been well characterized and any impacts that may be encountered during demolition and redevelopment will likely be minimal and restricted to soil. Order No. 93-111 did not stipulate cleanup standards for soil. Should impacts to soil or groundwater be discovered during redevelopment of the property, ESL's or CHHSL's (California Human Health Screening Levels), would likely be an appropriate preliminary cleanup standards for this Site based on future use (i.e., residential, industrial). In addition, site-specific risk assessment may be utilized to establish final cleanup standards, as necessary.

5. **CEQA:** This action is an order to enforce the laws and regulations administered by the Board. As such, this action is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Section 15321 of the Resources Agency Guidelines.

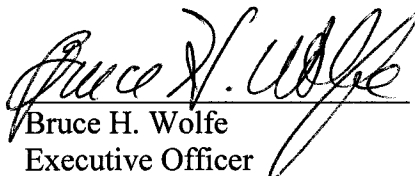
6. **Notification:** The Water Board has notified the dischargers and all interested agencies and persons of its intent under California Water Code Section 13304 to rescind site cleanup requirements for the discharge, and has provided them with an opportunity to submit their written comments.

7. **Public Hearing:** The Water Board, at a public meeting, heard and considered all comments pertaining to this discharge.

IT IS HEREBY ORDERED, pursuant to Section 13304 of the California Water Code, that Order Nos. 93-111 and R2-2003-0060 are rescinded.

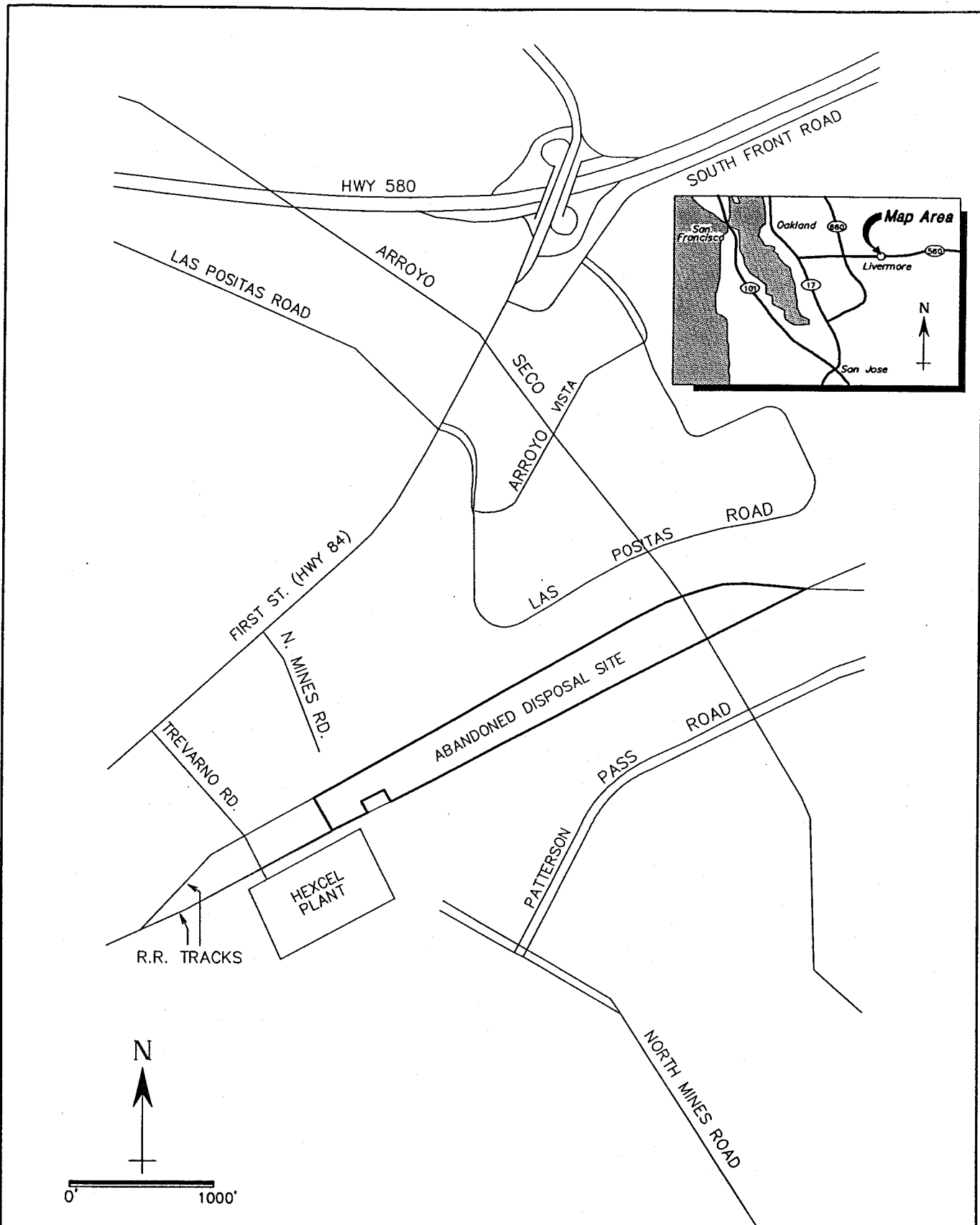
IT IS FURTHER ORDERED that the discharger shall comply with the institutional controls and risk management procedures described in this order and shall properly close all groundwater wells consistent with applicable local agency requirements, and shall document such closure in a technical report to be submitted to the Board within 30 days following the completion of closure activities.

I, Bruce H. Wolfe, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on July 12, 2006.

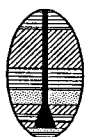

Bruce H. Wolfe
Executive Officer

FAILURE TO COMPLY WITH THE REQUIREMENTS OF THIS ORDER MAY SUBJECT YOU TO ENFORCEMENT ACTION, INCLUDING BUT NOT LIMITED TO: IMPOSITION OF ADMINISTRATIVE CIVIL LIABILITY UNDER WATER CODE SECTIONS 13268 OR 13350, OR REFERRAL TO THE ATTORNEY GENERAL FOR INJUNCTIVE RELIEF OR CIVIL OR CRIMINAL LIABILITY.

Attachment: Figure 1, Site Map



NAME: D:\3690\3690017A.DWG DATE: JUL 07, 1993 TIME: 9:06 AM



**HYDRO
GEO
CHEM, INC.**

SITE LOCATION

Approved

[Signature]

Date

7/07/93

Revised

Date

Reference:

3690017A

FIG.

1.1